

## **Communication Service for the Deaf (CSD) – February 18, 2004**

Functional Equivalence: Telecommunications relay services must be functionally equivalent to conventional voice telephone services under Title IV of the Americans with Disabilities Act

- Text-based relay services: slow – conversation is delayed while one party is responding, not in one's native language, unable to convey emotion, unable to capture or respond to interactive voice response (IVR) prompts
- Video relay services: natural, flowing conversations that mirror speed of voice conversations, in one's native language, able to convey emotions, able to interact with IVR systems

Voluntary VRS in 2000. Why is functional equivalency needed now?

2000: Nearly all VRS accessed through public stations (VRS stations located in consumer organizations, community service groups, schools, etc.)

2004: Improved VRS technologies – calls made from homes and offices

2000: One provider (CSD/Sprint)

2004: Several providers – competitive industry

2000: Very slow growth – difficult to predict calling patterns and growth

2004: May 2003 – NECA had predicted 30% growth through June 2004. New projections released last month raised this estimate to 196% growth by June 2004. Calling patterns beginning to stabilize – enables VRS providers to make better staffing decisions

2000: VRS technology in its infancy

2004: Improved technologies, with distribution networks that enable faster answer speeds, improvements in picture quality and end user functionality, incorporation of customer friendly interfaces – all have dramatically facilitated use of VRS

2000: Broadband penetration in deaf community fairly low

2004: Broadband penetration growing, and introduction of new TV-based broadband appliances enable consumers to use VRS without purchasing costly computer equipment

2000: VRS is considered an optional or “extra” service

2004: Deaf community coming to rely on VRS as a principal source of daily telecommunications access that provides functional equivalent telephone service

Conclusion: Continued waivers of the answer speed standard is not in the public interest. Functionally equivalent service demands 85/10 answer speeds and mandated VRS